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Attorneys for Capital Finance, LLC

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: Case No. 19-76260 (AST)
Absolut Facilities Management, LLC, *et al.*, : Case No. 19-76263 (AST)
Debtors.¹ : Case No. 19-76267 (AST)
: Case No. 19-76268 (AST)
: Case No. 19-76269 (AST)
: Case No. 19-76270 (AST)
: Case No. 19-76271 (AST)
: Case No. 19-76272 (AST)
: Joint Administration Requested
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NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES

PLEASE TAKE NOTICE that Blank Rome LLP hereby enters its appearance, pursuant to section 1109(b) of chapter 11 of title 11 of the United States Code (the “***Bankruptcy Code***”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “***Bankruptcy Rules***”), on behalf of Capital Finance, LLC (“***Capital Finance***”). The undersigned attorneys hereby request, pursuant to Bankruptcy Rules 2002, 3017, and 9007, and Bankruptcy Code sections 342, 1102(a)(1), and 1109(b), that copies of all notices and pleadings given or filed in the above-

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Absolut Facilities Management, LLC (1412); Absolut Center for Nursing and Rehabilitation at Allegany, LLC (7875); Absolut Center for Nursing and Rehabilitation at Aurora Park, LLC (8266); Absolut Center for Nursing and Rehabilitation at Gasport, LLC (8080); Absolut at Orchard Brooke, LLC (1641); Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC (8300); Absolut Center for Nursing and Rehabilitation at Three Rivers, LLC (8133); and Absolut Center for Nursing and Rehabilitation at Westfield, LLC (7924).

captioned cases (the “*Cases*”) and all related proceedings be given and served upon the following persons at the addresses, facsimile numbers, or electronic mail addresses set forth below:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Fed. R. Bankr. P. 2002, the undersigned counsel hereby request copies of all papers including, without limitation, all motions, notices, applications, orders, reports, legal memoranda, exhibits and all other papers which are filed with the Court or served upon any party. All copies should be sent to the above-listed persons by electronic mail and/or by mail to the addresses appearing above.

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Code and Bankruptcy Rules, but also includes, without limitation, orders and notices of any petition, pleading, complaint, hearing, application, motion, request or demand, whether formal or informal, written or oral, or whether made by mail, email, hand delivery, telephone, facsimile, or otherwise which affect or seek to affect in any way the rights or interests of any party in these Cases.

PLEASE TAKE FURTHER NOTICE that this request pursuant to Fed. R. Bankr. P. 2002 shall not be deemed or construed to be a submission by Capital Finance to the jurisdiction or power of this Court or a waiver of any substantive or procedural rights of Capital Finance, including without limitation, to: (a) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (b) have final orders in non-core

matters entered only after *de novo* review by the District Court; (c) a trial by jury in any proceeding so triable in these Cases or any case, controversy, or proceeding related to these Cases; (d) require that where any adversary proceeding is to be initiated against Capital Finance in these Cases or any related case or where any proceeding is to be initiated by complaint against Capital Finance under applicable non-bankruptcy law, service shall be made on Capital Finance, as applicable, in accordance with applicable Federal Rules of Civil Procedure and applicable non-bankruptcy law, and that service upon undersigned counsel is insufficient for such purposes; or (e) any other rights, claims, actions, defenses, setoffs or recoupments to which Capital Finance is or may be entitled in law or at equity, all of which rights, claims, actions, defenses, setoffs or recoupments Capital Finance expressly reserves.

Dated: New York, New York
September 17, 2019

BLANK ROME LLP

By: /s/ Evan J. Zucker
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